

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: REVIEW OF ELECTRIC INTERCONNECTION OF DISTRIBUTED GENERATION FACILITIES RULES [199 IAC CHAPTER 45]	DOCKET NO. RMU-2016-0003
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STATEMENT OF POSITION

The Office of Consumer Advocate (“OCA”), a division of the Iowa Department of Justice, files this Statement of Position in the above-captioned rulemaking proceeding.

1. On July 22, 2016, the Iowa Utilities Board (“Board”) commenced this rulemaking proceeding to update the interconnection requirements for electric customers with distributed generation facilities. This rulemaking follows lengthy proceedings regarding distributed generation in NOI-2014-0001, and in the Order Commencing Rulemaking, the Board incorporated stakeholder input from the NOI docket. Accordingly, OCA reiterates its position that customer-owned distributed generation should be encouraged and supported, as stated in comments submitted in that docket, but will not repeat those comments here.

2. OCA has reviewed the proposed updates and is generally supportive of the Board’s proposed changes. OCA’s discussion here is limited to its specific concerns with the proposed rules.

3. The Board proposed the adoption of 45.3(2)“f,” which allows a utility to disconnect a distributed generation customer that fails to comply with the requirements of rule 45.3. OCA encourages the Board to modify proposed 45.3(2)“f” to require that when a disconnection device is installed next to the meter, only the interconnected distributed generation portion of a customer’s service may be disconnected. Disconnection of a customer’s entire

electric service should only be performed when it is not feasible to separately disconnect the customer's interconnected distributed generation.

4. OCA appreciates the Board's effort to clarify the application process and make forms readily available to the public. However, OCA believes that the information required to be provided in the application process should be considered Board policy and properly detailed in Board rules. While the forms themselves need not be contained in the rules, utilities and customers alike benefit from the certainty provided by having the basic requirements and procedure for the interconnection process contained in rules.

5. With respect to the pre-application request process, OCA supports the Board's efforts to give customers additional opportunities to make informed decisions about interconnection of distributed generation facilities. OCA takes no specific position on the pre-application process at this time, but reserves the right to respond to comments submitted by other parties.

OCA appreciates the opportunity to provide comments addressing the proposed rule amendments in chapter 45. OCA will be pleased to participate in any further proceedings the Board may wish to conduct on these proposed rule amendments.

Respectfully submitted,

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